

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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| SECURITIES AND EXCHANGE COMMISSION, | :                    |
|                                     | :                    |
|                                     | Plaintiff,           |
|                                     | :                    |
| v.                                  | : Case No. 15-cv-894 |
|                                     | : (WHP)(JLC)         |
| CALEDONIAN BANK LTD.,               | :                    |
| CALEDONIAN SECURITIES LTD.,         | :                    |
| CLEAR WATER SECURITIES, INC.,       | :                    |
| LEGACY GLOBAL MARKETS S.A., and     | :                    |
| VERDMONT CAPITAL, S.A.              | :                    |
|                                     | :                    |
|                                     | Defendants.          |
|                                     | :                    |

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**DECLARATION OF A. DAVID WILLIAMS**

A. DAVID WILLIAMS, an attorney, declares and states as follows:

1. I am a member in good standing of the bar of the State of California and am employed as a litigation attorney in the Division of Enforcement of the Securities and Exchange Commission at its Washington, D.C. headquarters. I serve as a litigation and trial attorney for the SEC in Securities and Exchange Commission v. Caledonian Bank Ltd., et al., Case No. 15-cv-894 (WHP), in the United States District Court for the Southern District of New York. I make this Declaration in support of the Motion For Leave For Richard Simpson And David Williams To Withdraw From This Action As Counsel For The SEC.

2. The reason for my withdrawal from this action is that, as of November 28, 2015, I will no longer be employed by the SEC and will have no authority to represent it in civil enforcement actions. I am leaving the SEC for a position to which I first applied on or about June 24, 2015. The posture of this action is that on November 10, 2015, the Court denied Defendant Verdmont

Capital, S.A.'s motion for judgment on the pleadings and lifted the stay of discovery (ECF No. 140). There is no trial date set. I am not asserting a retaining or charging lien.

3. SEC trial attorneys Gregory Bockin and Patrick Costello will replace me as counsel. Mr. Costello will file a motion to appear *pro hac vice* today, and Mr. Bockin will file a similar motion as soon as he receives a certificate of good standing from the State of Georgia, which he requested on November 6, 2015. Therefore, my withdrawal will have no adverse effect on the action.

I declare under penalty of perjury that the foregoing is true and correct. Executed on November 24, 2015.

A. David Williams  
A. David Williams